## 510(k) Summary (K131096)

In accordance with the requirements of 21 CFR 807.92, Arobella Medical is submitting the following 510(k) summary for the AR1000 Ultrasonic Wound Therapy System and its variants. (Reference previous 510(k) K062544)

## 807.92(a)(1)

#### Submitter Information

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Date: May 16, 2014

#### 807.92(a)(2)

Trade Names: AR1000/B Ultrasonic Wound Therapy System, AR1000/B Qoustic Wound Therapy System<sup>™</sup> (QWTS), or Qoustic Choice Wound Therapy System

Common Name: Ultrasonic Wound Therapy System

Classification Name(s): Ultrasonic Surgical Instrument; Wound Cleaner, Ultrasound

Product Classification: Class II or in the alternate Unclassified

Product Code: LFL

## 807.92(a)(3)

## Predicate Device(s)

Arobella Medical,	LLC AR1000 Ultrasonic Wound Therapy System	K062544
Misonix, Inc	SonicOne Ultrasonic Wound Debridement System	K112782
Celleration	Celleration Mist Therapy System	K122246
Soring Gmbh	SONOCA 180 / 185 Wound Care System	K072904

#### 807.92(a)(4)

## **Device Description**

The AR1000 Ultrasonic Wound Therapy System and its variants use ultrasonic energy from a generator delivered by a conductive cable to a hand held converter through the converter's distal end probe and liquid coupling medium: to perform wound therapy; to perform ultrasonic surgical, excisional, and or sharp-edge selective dissection procedures; with the intended end result to promote healing.

The AR1000 Ultrasonic Wound Therapy System generator utilizes commonly available wall outlet power (85 -260VAC, 50/60Hz) to produce the ultrasonic signal. A conductive cable connects the generator to the hand held converter. The hand held converter converts the signal into ultrasonic mechanical displacement in the distal end probe or Qurette. The ultrasonic mechanical displacement energy is applied to the treatment site by the distal end probe or Qurette through direct contact or non-contact techniques. The ultrasonic mechanical displacement energy is also transmitted as ultrasonic energy to the treatment site via the liquid coupling medium.

The AR1000 Ultrasonic Wound Therapy System distal end probe or Qurette is used with contact or non-contact modes to achieve intended wound therapy modalities to promote wound healing. This is achieved through the use of the low-frequency, controlled-intensity, ultrasonic energy to perform ultrasonic dissection and fragmentation of tissues, debridement of wound tissue (acute and chronic wounds, burns, diseased or necrotic tissue), and surgical, excisional or sharp-edge incisions.

The AR1000 Ultrasonic Wound Therapy System distal end probe or Qurette is used with contact or non-contact modes to achieve wound therapy and promotes wound healing through the ultrasonic dissection and fragmentation of tissues, debridement of wound tissue (acute and chronic wounds, burns, diseased or necrotic tissue) through the use of the low-frequency, controlled-intensity, non-thermal ultrasonic energy.

The AR1000 Ultrasonic Wound Therapy System ultrasonic energy, via the liquid coupling medium to the treatment site, promotes wound healing through the lavage of wound tissue (acute and chronic wounds, burns, diseased or necrotic tissue) and cleansing irrigation of the site for the removal of debris, exudates, fragments, bacteria, and other matter.

The AR1000 Ultrasonic Wound Therapy System uses continuous ultrasonic energy to propel the liquid medium (e.g. sterile saline, or other appropriate US FDA cleared medium) into a solution stream and couples the delivery of ultrasonic energy to the treatment site. This is accomplished by the ultrasonic energy application to the

treatment site where the ultrasonic energy is transmitted via the converter probe (Qurette) and also coupled via the liquid medium to the treatment site.

The converter has a transducer horn that is made from titanium alloy (TI-6AL-4V). The converter probe Qurette tips are made from titanium alloy (TI-6AL-4V),

No latex is used in this device, including any potential patient-contact areas, and testing has revealed no negative reactions to the materials used in this device.

Specifications:

Generator Power Source 85 -260V~ (VAC), 2.5A, 50/60Hz

Converter Power Output <140 watts

Amplitude (adjustable) 0um ~ 75um (0% to 100% power level)

Frequency 35kHz (±3kHz)

Weight Generator: ~12.5 lbs

Handheld Converter: ~1.0 lbs

Approximate Dimensions System

inches Height

System 15 inches Deep x 12 inches Wide x 6

Handheld Converter: 9 inches x 1.3 inches diameter

Storage Temperature -20 to +50° C at a maximum relative humidity of

90% (non-condensing)

Operating Temperature 0 to +40° C at a maximum relative humidity of 90%

(non-condensing)

#### 807.92(a)(5)

## Intended Use(s)

The AR1000 Series and its variants produce and deliver low frequency ultrasound used to promote wound healing via:

- Selective and non-selective dissection and fragmentation of soft and or hard tissue:
- Surgical, excisional or sharp-edge wound debridement (acute and chronic wounds, burns) for the removal of nonviable tissue including but not limited to diseased tissue, necrotic tissue, slough and eschar, fibrin, tissue exudates, bacteria and other matter.

Patient population is patients of any age with one or more wounds. Patient population may also exhibit diabetes mellitus (DM).

The AR1000 Series and its variants is intended for Prescription use.

The AR1000 Series and its variants produce and deliver low frequency ultrasound used to promote wound healing via:

- Site cleansing irrigation and lavage of wound tissue (acute and chronic wounds, burns, diseased or necrotic tissue):
- Contact and or non-contact maintenance debridement for the removal of debris, exudates, fragments, bacteria, slough, fibrin, excised or fragmented tissue, and other matter.

#### **IRRIGATION (LAVAGE) FLUID**

• Irrigation fluid may be sterile de-ionized water, sterile saline solution, other approved wound therapy or debridement solution.

Patient population is patients of any age with one or more wounds. Patient population may also exhibit diabetes mellitus (DM).

The AR1000 Series and its variants is intended for Prescription use.

The AR1000 Series and its variants produce and deliver low frequency ultrasound used to promote wound healing by:

• Preparing the wound bed for graft or other subsequent procedures using contact and or non-contact techniques to achieve wound debridement.

Patient population is patients of any age with one or more wounds. Patient population may also exhibit diabetes mellitus (DM).

The AR1000 Series and its variants is intended for Prescription use.

807.92(a)(6) There have been no changes to the AR1000 Ultrasonic Wound Therapy System cleared under 510(k) K062544 as a

result of the proposed labeling changes. The following Tables illustrate similarities and differences between the submitted AR1000 Ultrasonic Wound Therapy System and the predicate devices.

system produces a low wound healing through exudates and bacteria. mist used to promote ultrasound generated wound cleansing and slough, fibrin, tissue debridement by the The MIST Therapy Table 1: Comparison of Technical Characteristics Table - Specified Indications For Use with Identified Predicates removal of yellow Celleration Mist maintenance **<122246** energy The Misonix SonicOne is to: burn wounds, diabetic vaginal ulcers, soft tissue which, in the physician's cleansing of the surgical debridement of wounds, udgment would require he use of an ultrasonic such as, but not limited indicated for use in the ulcers, bedsores and site in applications in aspirator with sharp Misonix SonicOne debridement and debridement. K112782 the site for the removal cleansing irrigation of and fragmentation of fragments, and other and chronic wounds, necrotic tissue), and Selective dissection of debris, exudates, debridement (acute burns, diseased or Arobella AR1000 tissue, wound K062544 dissection and fragmentation of eschar, fibrin, tissue exudates, variants produce and deliver low nonviable tissue including but not limited to diseased tissue, Surgical, excisional or sharp- Selective and non-selective (acute and chronic wounds, necrotic tissue, slough and frequency ultrasound used to Arobella AR1000 (Proposed bacteria and other matter. edge wound debridement promote wound healing via: burns) for the removal of The AR1000 Series and its soft and or hard tissue; K131096) Indications indicated **US FDA** for Use Device 510(k) 510(k) рег

Table 2: Co	Table 2: Comparison of Technical Characteristics Table – Specified Indications For Use with Identified Predicates	teristics Table - (	Specified Indications	For Use with Ide	entified Predicates
Device	Arobella AR1000 (Proposed K131096)	Arobella AR1000	Misonix SonicOne	Celleration Mist	Soring Sonoca
510(k)	The AR1000 Series and its	K062544	K112782	K122246	K072904
Indications	low frequency ultrasound	Selective	The Misonix	The MIST	The SONOCA 180
for Use	used to promote wound	dissection and	SonicOne is	Therapy	/ 185 Wound Care
per	healing via:	fragmentation	indicated for use in	system	system is an
indicated	Site cleansing irrigation	of tissue,	the debridement of	produces a low	instrument
US FDA	and layage of wound fissing	wonnd	wounds, such as,	energy	intended for
510(k)	(acute and chronic	debridement	but not limited to:	ultrasound	selected
	wounds burns disposed	(acute and	burn wounds,	generated mist	ultrasound
	or poprotio ties.10).	chronic	diabetic ulcers,	used to	dissection and
	חפסוסים הפסמים)	wounds, burns,	bedsores and	promote wound	fragmentation of
	Contact and non-contact	diseased or	vaginal ulcers, soft	healing through	tissue, wound
	maintenance debridement	necrotic tissue),	tissue debridement	monud	debridement
	for the removal of debris,	and cleansing	and cleansing of	cleansing and	(acute and chronic
	exudates, fragments,	irrigation of the	the surgical site in	maintenance	wounds, burns,
	bacteria, slough, fibrin,	site for the	applications in	debridement by	diseased or
	excised or fragmented	removal of	which, in the	the removal of	necrotic tissue)
	tissue, and other matter.	debris,	physician's	yellow slough,	and cleansing
		exudates,	judgment would	fibrin, tissue	irrigation of the site
		fragments, and	require the use of	exudates and	for removal of
	IRRIGATION (LAVAGE)	other matter.	an ultrasonic	bacteria.	debris, exudates,
	FLUID		aspirator with sharp		fragments, and
	Irrigation fluid may be		debridement.		other matter.
	sterile de-ionized water,	•			
	sterile saline solution, other				
	approved wound therapy				
	or debridement solution.				

Table 3: Comparison of Technical Characteristics Table - Specified Indications For Use with Identified Predicates

Soring Sonoca	K072904	The SONOCA 180	/ 185 Wound Care	system is an	instrument	intended for	selected	ultrasound	dissection and	fragmentation of	tissue, wound	debridement	(acute and chronic	wounds, burns,	diseased or	necrotic tissue)	and cleansing	irrigation of the	site for removal of	debris, exudates,	fragments, and	other matter.			
Celleration Mist	K122246	The MIST	Therapy	system	produces a low	energy	ultrasound	generated mist	nsed to	promote wound	healing through	punom	cleansing and	maintenance	debridement by	the removal of	yellow slough,	fibrin, tissue	exudates and	bacteria.		•		-	
Misonix SonicOne	K112782	The Misonix	SonicOne is	indicated for use in	the debridement of	wounds, such as,	but not limited to:	burn wounds,	diabetic ulcers,	bedsores and	vaginal ulcers, soft	tissue debridement	and cleansing of	the surgical site in	applications in	which, in the	physician's	judgment would	require the use of	an ultrasonic	aspirator with sharp	debridement.	•		
Arobella AR1000	K062544	Selective	dissection and	fragmentation	of tissue,	punom	debridement	(acute and	chronic	wounds, burns,	diseased or	necrotic tissue),	and cleansing	irrigation of the	site for the	removal of	debris,	exudates,	fragments, and	other matter.					
Arobella AR1000 (Proposed K131096)	The AR1000 Series and its variants produce and deliver	low frequency uttrasound	used to promote wound	healing by:	Droponica the work	for graft or other	orbeognost propodures	sansedneur biocedules	using contact and of non-	contact techniques to	Aphidomont	מפחותפווני										_		_	
Device	510(k)	SUS	for Use		indicated	US FDA	510(k)																		

510(k) - AR1000 Series K131096 Arobella Medical, LLC

Table 4: Comparison of Technical Characteristics Table continued

			•			
Soring Sonoca	K072904	High Intensity Ultrasound 40KHz	Contact probe	General cavitation (thermal agitation and fragmentation) of wounds and tissue	Applicator size, positioning, frequency and duration of treatments	Intra-operative settings
Celleration Mist	K122246	High Intensity Ultrasound 40KHz	Atomized irrigant and Non-contact probe	Ultrasound wound cleansing and maintenance debridement	Applicator positioning, frequency and duration of treatments, Mist flow rate	Hospital, clinic, or in-home settings
Misonix SonicOne	K112782	High Intensity Ultrasound 22.5KHz	Contact probe	General cavitation (thermal agitation and fragmentation) of wounds and tissue	Applicator size, positioning, frequency and duration of treatments	Hospital, clinic, in- home, or intra- operative settings
Arobella AR1000	K062544	High Intensity Ultrasound and irrigation 35KHz	Irrigation, atomized irrigation, contact, and non-contact probe	Ultrasound for selective tissue dissection, fragmentation, and irrigation of wound bed over course of treatment	Applicator size, positioning, contact surface, frequency and duration of treatments, irrigation flow rate	Hospital, clinic, in- home, or intra- operative settings
Arobella AR1000 Arobella AR1000 Misor	This submission K131096	High Intensity Ultrasound and irrigation 35KHz	Irrigation, atomized irrigation, contact, and non-contact probe	Ultrasound for selective tissue dissection, fragmentation, and irrigation of wound bed over course of treatment	Applicator size, positioning, contact surface, frequency and duration of treatments, irrigation flow rate	Hospital, clinic, inhome, or intra-
Device	510(k) number	Device Agent	Agent Delivery	Agent Mechanism	Treatment Variable	Treatment Setting

807.92(b)

#### Safety and Effectiveness

There have been no changes to the AR1000 Ultrasonic Wound Therapy System cleared under 510(k) K062544 as a result of the proposed labeling changes.

This 510(k) submission supports an expansion of the device's Indications For Use, with respect to K062544, to incorporate expanded patient results and laboratory findings.

The expansion of the device's Indications For Use, with respect to K062544, do not raise any new issues of safety or effectiveness.

For safety and effectiveness purposes the AR1000 Ultrasound Wound Therapy System and its variants is substantially equivalent to the previously cleared AR1000 Ultrasound Wound Therapy System (K062544), the Misonix SonicOne (K112782) system, Celleration MIST (K122246) system, the Soring Sonoca (K072904) systems, and the Ethicon (K002906) system.

## 1.0 Efficacy

This device, like the predicates, is directed for single (1) treatment, and total recommended treatments shall be no more than three (3) times per week or as directed on the order of the physician. A typical treatment regimen is approximately two (2) weeks or more, depending on the size and nature and or condition of the treated area as well as other subject dependent factors, but may be prescribed for more or less frequent use and or for shorter or longer treatment regimen durations on the order of a physician.

This device also compares with the predicates, as follows:

- 1.1. Controlled ultrasonic delivery with 0.9% sterile saline solution, or other approved medium, to lavage the wound tissue (e.g. acute and chronic wounds, burns, diseased or necrotic tissue), like the Arobella AR1000 (K062544) system and the Celleration (K122246) predicate ultrasonic wound system.
- 1.2. Maintenance debridement of the treatment site for the removal of loose fragments, debris, exudate, bacteria, and other matter, like Arobella AR1000 (K062544) system, the Misonix SonicOne (K112782) system, the Celleration (K122246) system, and the Soring Sonoca (K072904) predicate ultrasonic wound system.

1.3. Ultrasonic selective dissection and debridement of tissue through the use of the probe (aka Qurette), including parallel to the wound bed surface for shallow separation of tissue layers, like the predicate Arobella AR1000 (K062544) system and the Misonix SonicOne (K112782) system.

## 2.0 Safety

The AR1000 Ultrasonic Wound Therapy System and its variants consists of an ultrasonic power supply (hereto after referred to as a generator), an ultrasonic converter hand piece (or just converter), and distal end probe tip (Qurette), a liquid supply reservoir and delivery tubing. Substantial equivalence has been previously established between the AR1000 Ultrasonic Wound Therapy System (K062544) and the Celleration Mist, and the Misonix SonicOne predicate ultrasonic wound cleanser devices as outlined under K062544.

## 2.1 Electrical Safety & Electromagnetic Compatibility

Similar to the relevant predicates, this device complies with the following standards:

- IEC 60601-1 Medical electrical equipment, Part 1: General requirements for basic safety and essential performance
- UL 60601-1 Medical Electrical Equipment, Part 1: General Requirements for Safety
- IEC 60601-1-2 Medical electrical equipment, Part 1-2: Electromagnetic compatibility
- Requirements and tests
- IEC 60601-1-4 Medical electrical equipment, Part 1-4: Programmable electrical medical systems
- FCC Part 18 EMC Requirements

#### 2.2 Ultrasonic Safety

Similar to the relevant predicates, this device complies with the following standards:

- 21 CFR 1050.10 Ultrasonic therapy products
- IEC 61847 Ultrasonics Surgical systems Measurement and declaration of the basic output characteristics

#### 2.3 Biocompatibility

Similar to the relevant predicates, this device was tested for and complies with the standard ISO 10993-1:2003 - Biological evaluation of medical devices, Part 1: Evaluation and testing and its relevant annexes (based on nature and duration of patient contact). All testing was conducted in compliance to 21 CFR, Part 58 Good Laboratory Practice for Nonclinical Laboratory Studies.

The AR1000 system is routinely used with 0.9% sterile saline solution, which is widely available for purchase from medical suppliers in bottle or bag form and is to be supplied by the user, as well as the tubing and the valve (for saline flow control). In the alternate, the AR1000 can also be used with other appropriate sterile mediums and US FDA-approved irrigation liquids. This is substantially equivalent to all of the predicate devices and irrigation solutions.

## 2.4 Transportation/Storage

Packaging systems for the non-sterile device and for the non-sterile accessories of the device (e.g. the converter, tips, shroud, et al) keep the product without deterioration and without a specific level of sterility stipulated, as do the predicate devices. Those accessories used specifically for treatment (e.g. converter, tip, shroud, etc) are to be sterilized prior to use to minimize the risk of microbial contamination, as established with the AR1000 K062544 device clearance.

As the device and the accessories are durable goods with little or no notable deterioration, the shelf life is the product lifecycle, barring storage or transportation damage, and/or use under extremes of environmental conditions (e.g. temperature, humidity, moisture, etc).

#### 2.5 Reprocessing

The AR1000 system, as well as the AR1000 ultrasonic converter hand piece, is the wound debridement device cleared under K062544 for which reprocessing instructions have been previously validated and cleared.

The variant AR1000 ultrasonic converter hand piece allows for steam sterilization (autoclave) in addition to the previously cleared and validated reprocessing methodology. This variant may therefore be reprocessed by steam sterilization (autoclave), as well as the previously cleared and validated reprocessing methodology.



Food and Drug Administration 10903 New Hampshire Avenue Document Control Center – WO66-G609 Silver Spring, MD 20993-0002

May 16, 2014

Arobella Medical LLC
Matthew Berscheid
Director of Quality and Regulatory Affairs
5929 Baker Road, Suite 470
Minnetonka, MN 55345

Re: K131096

Trade/Device Name: AR1000 Ultrasonic Wound Therapy System

Regulation Number: 21 CFR 878.4410

Regulatory Class: Class II Product Code: NRB Dated: April 03, 2014 Received: April 04, 2014

Dear Mr. Berscheid:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set

## Page 2 - Matthew Berscheid

forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address

http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to

http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address

http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely yours,

## **David Krause -S**

for Binita Ashar, MD, MBA, FACS
Acting Director
Division of Surgical Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

cc: DMC 510(k) Staff Division D.O.

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## **Indications for Use**

510(k) Number (if known): _K131096_						
Device Name: AR1000 Series Ultrasonic Wound Therapy System						
Indications For Use:						
The AR1000 Series and its variants produce and deliver low frequency ultrasound used to promote wound healing via:						
<ul> <li>Selective and non-selective dissection and fragmentation of soft and or hard tissue;</li> </ul>						
<ul> <li>Surgical, excisional or sharp-edge wound debridement (acute and chronic wounds, burns) for the removal of nonviable tissue including but not limited to diseased tissue, necrotic tissue, slough and eschar, fibrin, tissue exudates, bacteria and other matter.</li> </ul>						
Patient population is patients of any age with one or more wounds. Patient population may also exhibit diabetes mellitus (DM).						
Prescription Use X AND/OR Over-The-Counter Use (21 CFR 801 Subpart C)						
(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)						
Concurrence of CDRH, Office of Device Evaluation (ODE)						
Jiyoung Dang -S						
Division Sign-Off Office of Device Evaluation						
510(k)_K131096 Page 1 of 3						

510(k)\_\_K131096\_\_

## Indications for Use

510(k) Number (if known): K131096 Device Name: AR1000 Series Ultrasonic Wound Therapy System Indications For Use: The AR1000 Series and its variants produce and deliver low frequency ultrasound used to promote wound healing via: Site cleansing irrigation and lavage of wound tissue (acute and chronic wounds, burns, diseased or necrotic tissue): Contact and or non-contact maintenance debridement for the removal of debris, exudates, fragments, bacteria, slough, fibrin, excised or fragmented tissue, and other matter. **IRRIGATION (LAVAGE) FLUID**  Irrigation fluid may be sterile de-ionized water, sterile saline solution, other approved wound therapy or debridement solution. Patient population is patients of any age with one or more wounds. Patient population may also exhibit diabetes mellitus (DM). Over-The-Counter Use AND/OR Prescription Use X (21 CFR 801 Subpart C) (Part 21 CFR 801 Subpart D) (PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED) Concurrence of CDRH, Office of Device Evaluation (ODE) Jiyoung Dang -S **Division Sign-Off** Office of Device Evaluation

510(k)\_\_K131096\_\_\_

Page 2 of 3

# Indications for Use

510(k) Number (if known): _K131096_
Device Name: AR1000 Series Ultrasonic Wound Therapy System
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<ul> <li>Preparing the wound bed for graft or other subsequent procedures using contact and or non-contact techniques to achieve wound debridement.</li> </ul>
Patient population is patients of any age with one or more wounds.  Patient population may also exhibit diabetes mellitus (DM).
Prescription Use X AND/OR Over-The-Counter Use (21 CFR 801 Subpart C)
(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)
Concurrence of CDRH, Office of Device Evaluation (ODE)
Jiyoung Dang -S
Division Sign-Off Office of Device Evaluation
510(k)K131096 Page 3 of 3